

WMN:SLT
F.# 2011R00076/OCDETF # NY-NYE-578

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

IANI TASSEV,

Defendant.

- - - - -X

THE GRAND JURY CHARGES:

CONSPIRACY TO IMPORT MARIJUANA

1. In or about and between January 2000 and April 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant IANI TASSEV, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved 1,000 kilograms or more of a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(a)(1).

(Title 21, United States Code, Sections 963 and 960(b)(1)(G); Title 18, United States Code, Sections 3551 et seq.)

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ MAR 01 2011 ★
BROOKLYN OFFICE

I N D I C T M E N T

CR 11 - 0154

(T. 21, U.S.C., §§ 853(a),
853(p), 960(b)(1)(G) and
963; T. 18, U.S.C., §§ 3551
et seq.)

GARAUFIS, J.

BLOOM, M.J.

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant IANI TASSEV that, upon his conviction of the above-charged offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offense, to forfeit (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation, including, but not limited to, a sum of money equal to the total amount of gross proceeds the defendant obtained as a result of the offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value;

or

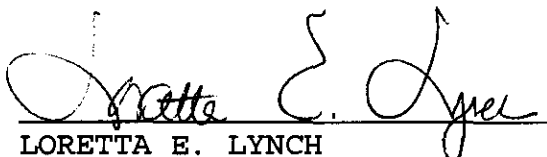
e. has been commingled with other property which cannot be divided without difficulty;
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

FORM DBD.34
JUN. 85

NO. F. # 2011R00076 / OCDETF # NY-NYE-0578

UNITED STATES DISTRICT COURT
EASTERN District of NEW YORK

THE UNITED STATES OF AMERICA

vs.

IANI TASSEV

Defendant.

I N D I C T M E N T

(T. 21, U.S.C., §§ 853(a), 853(p), 960(b) (1) (G) and 963;
T. 18, U.S.C., §§ 3551 et seq.)

A true bill.

Edi A. P.

Foreman

Filed in open court this _____ day.
Of _____ A.D. 2011 _____

Clerk

Bail, \$ _____

Steven Tiscione, AUSA 718-254-6317